

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

TYRONE FLINT, on Behalf of Himself and All Others Similarly Situated,	§	CIVIL ACTION NO. SA-15-CA-585-FB
Plaintiffs,	§	
	§	
	§	
v.	§	
	§	
Monique E. Cisneros and Mario Alberto Guerra, collectively d/b/a Mario's Welding,	§	JURY TRIAL DEMANDED
Defendants.	§	

PLAINTIFF'S ALTERNATIVE DISPUTE RESOLUTION REPORT

Pursuant to Rule CV-88 of the Local Rules of the United States District Court for the Western District of Texas and pursuant to the scheduling order in this matter, the Plaintiff, Tyrone Flint, submits the following ADR report:

- 1) On January 11, 2016, Plaintiff made a written offer of settlement. On January 21, 2016, Defendants rejected the settlement offer and proposed a counteroffer. Plaintiffs have rejected the counteroffer.
- 2) Defendants' counsel of record participated in the settlement negotiations. Plaintiff's counsel of record, J. Seth Grove, is responsible for settlement negotiations. The parties appear open to further settlement negotiations.
- 3) Parties are amenable to ADR, including mediation. Plaintiff wishes to receive all discovery responses, due by agreement within days of this report, prior to entering into any ADR procedure. Parties have not picked a mediator at this time.

Wherefore, Plaintiff respectfully files this Alternative Dispute Resolution Report.

Respectfully submitted,
The Vethan Law Firm, PC

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CERTIFICATE OF SERVICE

I hereby certify that, a true and correct copy of this instrument was served on all parties, represented through counsel or pro se, pursuant to the Federal Rules of Civil Procedure on this 25th day of January 2016, as follows:

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By: /s/ J. Seth Grove
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